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HEALTHCARE FINANCE, INC.

UNITED STATES BANKRUPTCY COURT**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

In re

SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor,

Case No. 16-bk-10015-FEC

Chapter 9

Adv. Case No. 18-01031

JSS1

**STIPULATION TO CONTINUE
MOTION FOR PRELIMINARY
INJUNCTION AGAINST VI
HEALTHCARE FINANCE, INC., FOR
SEQUESTRATION OF TAX REVENUES
PENDING FINAL RULING ON THE
MERITS OF THIS ADVERSARY CASE
OR FURTHER ORDER OF THIS COURT**

DATE: December 16, 2019**TIME: 9:00 a.m.****PLACE: 501 I Street****Sacramento, California 95814****Courtroom 28**

1 **TO THE HONORABLE FREDERICK E. CLEMENT, UNITED STATES BANKRUPTCY**
2 **JUDGE AND ALL PARTIES OF INTEREST:**

3 Southern Inyo Healthcare District ("Debtor"), and Vi Healthcare Finance, Inc., ("Vi"),
4 (collectively "Parties") by and through their undersigned counsel, enter into this Stipulation to
5 Continue Motion for Preliminary Injunction Against Vi Healthcare Finance, Inc., for Sequestration of
6 Tax Revenues Pending Final Ruling on the Merits of this Adversary Case or Further Order of this
7 Court ("Stipulation") as follows:

8 **RECITALS**

9 1. On November 1, 2018, Debtor filed Notice of Motion and Motion for Preliminary
10 Injunction Against Vi Healthcare Finance, Inc., for Sequestration of Tax Revenues Pending Final
11 Ruling on the Merits of this Adversary Case or Further Order of this Court ("Hearing") (Doc. 29).

12 2. On October 4, 2019, the Parties filed a Stipulation to Further Continue Status
13 Conference and Hearing on Motion for Preliminary Injunction Against Vi Healthcare Finance, Inc. for
14 Sequestration of Tax Revenues, etc., to December 16, 2019 (Doc. 78).

15 3. The Parties have engaged in settlement discussions. A Notice of Settlement was filed
16 in the Main Case (16-10015-A-9) on November 20, 2019 (Doc. 781). The Parties wish to continue the
17 Hearing to January 28, 2020 in order to prepare and have executed a Settlement Agreement.

18 4. Defendant and Plaintiff agree to continue the hearing on the Motion to February 24,
19 2020, at 1:30 p.m., provided that the Inyo County tax revenues at issue in the Motion (the "Tax
20 Revenues") are protected from distribution to any party pending a determination on the Motion by the
21 Court on February 24, 2020.

22 **STIPULATION**

23 NOW THEREFORE, based upon the foregoing recitals, and subject to Court approval, the
24 Parties hereby stipulate and agree as follows:

25 a. The hearing on the Notice of Motion and Motion for Preliminary Injunction Against Vi
26 Healthcare Finance, Inc., for Sequestration of Tax Revenues Pending Final Ruling on the Merits of
27 this Adversary Case or Further Order of this Court shall be continued to February 24, 2020, from
28 December 16, 2019;

- 1 b. Vi's opposition to the Motion shall be filed and served no later than February 10, 2020;
2 c. Debtor's reply, if any, shall be filed and served no later than February 18, 2020;
3 d. The Inyo County tax revenues at issue in the Motion (the "Tax Revenues") are
4 protected from distribution to any party pending a determination on the Motion by the Court on
5 February 24, 2020.

6
7 IT IS SO STIPULATED.

8 Dated: December 2, 2019.

WANGER JONES HELSLEY PC

9
10 By 

Oliver W. Wanger
Christopher A. Lisieski
Attorneys for HEALTHCARE
CONGLOMERATE ASSOCIATES, LLC
and VI HEALTHCARE FINANCE, INC.

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13 Dated: December 2, 2019.

JEFFREY S. SHINBROT, APLC

14
15 By 

Jeffrey S. Shinbrot
Attorney for Debtor SOUTHERN
INYO HEALTHCARE DISTRICT